



U.S. Department of Justice

---

950 Pennsylvania Avenue NW  
Washington, D.C. 20530

June 7, 2024

**VIA CM/ECF**

Hon. Dale E. Ho  
U.S. District Judge  
U.S. District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. M/Y Amadea*, No. 23-cv-9304 (DEH)

Dear Judge Ho,

We write regarding the Government's recent letter motion (ECF No. 115) to file Hague-related documents under temporary seal, pursuant to paragraph 9 of the Protective Order and Rule 6(d) of Your Honor's Individual Rules. The Government has notified the three UK witnesses about the temporary sealing and their right to request permanent sealing. However, regarding the French witness, the Government has been advised that the only permissible way to contact this witness and provide the requisite notice is through a formal Mutual Legal Assistance (MLA) request to the French authorities. The Government has commenced the MLA process, but completing it will take several more weeks at least. Accordingly, the Government respectfully requests that the French witness's name and address remain under seal for another 45 days from the filing of this letter motion. The Government will notify the Court, before the end of the requested 45-day period, whether notice has been effectuated.

Respectfully Submitted,

DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York  
U.S. Department of Justice

By: /s/ Jennifer Jude  
JENNIFER JUDE  
Assistant U.S. Attorney  
Southern District of New York

MARGARET A. MOESER  
Acting Chief  
Money Laundering and Asset Recovery  
Section, Criminal Division  
U.S. Department of Justice

By: /s/ Joshua L. Sohn  
JOSHUA L. SOHN  
Trial Attorney  
Money Laundering and Asset Recovery  
Section

JENNIFER KENNEDY GELLIE  
Executive Deputy Chief  
Counterintelligence and Export Control  
Section, National Security Division  
U.S. Department of Justice

By: /s/ Yifei Zheng  
YIFEI ZHENG  
Trial Attorney  
Counterintelligence and Export Control  
Section

cc: Claimants' counsel (by ECF)